REMARKS

Reconsideration and allowance of the claims in the application are requested.

Claims 1-39 are in the application. Claims 1-5, 10-20 and 23-27 have been rejected under 35 U.S.C. 103(a) as unpatentable over Murphy USP 6,282,362, of record, in view of USP 6,490,409 to S.S. Walker, issued December 3, 2002, filed November 23, 1998 (Walker).

Claims 6-9 have been rejected under 35 U.S.C. 103(a) as unpatentable over Murphy, of record, in view of Walker, of record, and in further view of Twining USP 6,222,449, of record.

Claims 21-22 and 28-29 have been rejected under 35 U.S.C. 103(a) as unpatentable over Murphy, of record, in view of Walker of record, and in further view of Matsuzawa USP 6,085,185, of record.

Claims 30-36 have been rejected under 35 U.S.C. 103(a) as unpatentable over Murphy, of record, in view of Walker, of record, and in further view of Godfrey USP 6,463,463, of record.

Claims 37-39 have been rejected under 35 U.S.C. 103(a) as unpatentable over Murphy, of record, in view of Walker, of record, in view of Godfrey of record, and in further view of Tobin USP 6,141,666, of record.

Before responding to the rejections, applicants would like to distinguish Walker from the present invention (Stern) and summarize the lack of disclosure and teaching in the cited references (Murphy, Twining, Matsuzawa and Godfrey) to enable a worker skilled in the art to implement Claims 1-39, as follows:

1. Walker discloses capturing and gathering personal photographic images of a customer taken at different times and diverse geographic locations via a plurality of cameras, geographically spaced from one another and oriented to capture, when activated, a plurality of customer images while visiting a particular activity. A registration unit responsive to inputs of a

customer stores distinctive data including customer identification and data for selecting the plurality of environments and text segments for the images. A detector associated with each camera, responsive to a customer tag, generates an activation signal to the camera which records the image of the customer at the location. A collection network transmits the tagged data, audio signal or still picture image signals to a central data storage subsystem. The tagged data is aligned with associated segments of the images transmitted by the different cameras at different locations. A processing module, under the control of a master controller, receives the image signals from the personal image storage or environment storage, and text generator, enabling the customers to copy the images. Walker fails to disclose elements of Stern, as follows:

A. Walker discloses a plurality of cameras responsive to a tag carried by the customer, transmitting recorded images to an external storage system for correlating images recorded by the cameras with text related to a geographical location. In contrast, Stern discloses a sole camera recording images and correlating the images with text within the camera. See page 9, lines 8-21. Walker fails to disclose collecting and correlating images with descriptive text within a sole camera.

B. Walker discloses a local data collection network receiving camera images and text for processing in an external module. In one embodiment, Stern discloses a camera assembling images and text within the camera and transmitting the assembled image and text to a network using network protocols. See Page 9, line 22 continuing to Page 10, line 4. Walker fails to disclose transmitting images and text to a network using network protocols for processing.

Summarizing, Murphy fails to disclose selecting and correlating descriptive text with an image at a geographical location, and communicating the recorded image with, or without

geographical location and descriptive text to a network. Walker discloses plural cameras responsive to a customer tag recording images and transmitting the images over a local data collection network to a service module for processing images with text. Walker fails to disclose the missing elements in Murphy regarding a sole camera processing the images with descriptive text and communicating the images over a network using network protocols with or without text. Twining only discloses an environmental recording device and fails to supply the missing elements in Murphy. Matsuzawa discloses obtaining thumbnail images from a multimedia database based on time codes, and fails to disclose storing a thumbnail in a medium based upon geographical location coordinates. Godfrey discloses a host sending a meeting request via a redirecting application when a request is received at the host, and fails to disclose a terminal generating a message to obtain images from a host according to geographical coordinates. Tobin discloses an image map, which provides hypertext links to website pages including images, and fails to disclose advertising messages generated by a terminal. Accordingly, the cited references, alone or in combination, fail to disclose or teach a worker skilled in the art to implement the elements of Claims 1-39, as previously described. The rejections of Claims 1-39 under 35 U.S.C. 103(a) fail for lack of disclosure in the cited references, taken alone, or in combination.

Now turning to the rejection, applicant responds to the indicated paragraphs of the Office Action, as follows:

REGARDING PARAGRAPH 1:

Applicant notes Examiner's comments.

REGARDING PARAGRAPHS 2 & 3:

Claims 1-5, 10-20 and 23-27 include elements not disclosed or taught in Murphy in view of Walker, as follows:

a. Claim 1:

(i) "...a device for recording an image including a geographical location, related to descriptive text scan and/or environmental conditions in a medium, comprising".

Murphy at Col. 8, lines 25-29, discloses a camera displaying text related to an image, but fails to disclose a camera recording an image with related descriptive text, and/or environmental conditions incorporated therein.

(ii) "...means for storing and accessing descriptive text related to the image at the geographical location;"

Murphy discloses a camera system that uses a geo address database and the geo address of the system to find the nearest named feature. In contrast, Stern discloses camera-controlled logic correlating the location coordinates and environmental information with the contents of the image within the camera and not with respect to an external database. Murphy fails to disclose the camera relating the descriptive text to the image.

(iii) "...means for recording the image, related geographical location, and descriptive text in the medium;"

Murphy at Column 1, line 13 and 16-18 discloses hyperlinks between recorded image data and stored multimedia data entities in a compressed PDF. Murphy displays the coordinate images shown in Figure 2, but does not record them in the image. Instead, Murphy discloses icons corresponding to the geographical location of the images. (Col. 10, lines 37-40) In contrast, Stern stores the image, geographical location, and descriptive text in the medium.

(Page 9, lines 3-4) Murphy fails to disclose recording the geographical coordinates in the medium or picture.

(iv) "...means for selecting and correlating the descriptive text with the image at the geographical location;"

Walker discloses a central storage system for performing, selecting, and correlating the descriptive text with the image. In contrast, the camera-control logic of Stern performs this function. (Page 8, lines 2-3) Walker does not supply the missing element in Murphy. Moreover, substituting Walker in to Murphy would render Murphy inoperative based on the image is not tied to a customer carrying a tag. Walker does not teach a worker skilled in the art to select and correlate descriptive text with an image when the image is not tied to a customer carried identification card.

(v) "...means for communicating the recorded image with, or without geographic location and descriptive text to a network for subsequent processing using network protocols."

Walker at Column 4, lines 15-30, discloses a video/image collection subsystem and not a network for subsequent processing using network protocols, described in the specification page 8, line 6.

Summarizing, Murphy in view of Walker fails to disclose or suggest or teach a worker skilled in the art to include in a camera device data processing means and camera-controlled logic for generating images including geographical location, related description and environmental conditions in a medium for communication to a network for subsequent processing using network protocols to enable users to enhance and readily recall recorded images.

b. Claim 2:

(i) "...data processing means responsive means to control means for receiving and converting optical information of the image and correlating the location and environmental information with the contents of the image into compressed digital form for storage in the local memory."

Murphy at Column 13, lines 10-13, describes an optical system and focusing mechanism responsive to an indexing unit 140 converting object images into digital image data. In contrast, Stern discloses digital processing system responsive to camera-controlled logic to capture the current image at a location and environmental information for storage in the memory. Murphy fails to disclose a data processing system; camera control logic, and the storage of the optical data in local memory with geographical and environmental information.

c. Claim 3:

Claim 3 further limits Claim 1 and is patentable on the same basis thereof.

d. Claim 4:

(i) "...a network interface to a database responsive to a user for selecting the stored descriptive text related to the object of interest recorded in a digital image."

Murphy at Column 16, lines 62-65, discloses a digital mapped database to be viewed on the viewer with an icon showing the user's current position on the map. In contrast, Stern discloses an interface 208 links the camera to a network enabling the user to access a server to obtain stored descriptive text for recording in the digital image. (Page 10, lines 17-20) Murphy and Walker fail to disclose a network interface to a database enabling a user to select descriptive text relative to a digital image.

e. Claim 5:

(i)"... means for accessing the memory and correlating the digital image with the geographic location; means for correlating the descriptive text with the object of interest and recording in a medium."

Walker at Column 5, line 46 to Column 6, line 7, describes an assembly and processing module external to the camera and producing a tape or disc related to a customer identification and configured to have a personal video segment recorded at different camera positions and diverse geographic locations. In contrast, Stern discloses a sole camera including a data processing system and camera control logic correlating the descriptive text with the image for recording in a medium, (Page 8, lines 1-3) Murphy modified by Walker would be inoperative based on the requirement of the image to be related to a customer identification. There is no requirement in Stern for the image to be related to customer identification.

f. Claim 10:

(i) "...the device of Claim 1 wherein said means of communicating includes wireless communications."

Murphy at Column 19, lines 29-32, discloses cameras including a position determining system linked to a GPD single receiver processor via a wireless link. In contrast, Stern discloses the camera linked to a network via a wireless link. Murphy and Walker fail to disclose a camera communicating with an external server via a wireless network link.

G. Claim 11:

(i) "...a terminal coupled to the network and responsive to a user input to obtain, select, display and record the stored image of the object of interest, with or without geographical location and descriptive text in the medium."

Murphy at Column 10, lines 66 through Column 11, line 19, discloses positioning a pixel or an image name on a menu and displaying the image contained in the related file. Murphy at Column 6, lines 31-36, discloses the image may be processed by a remotely located digital processing system. Murphy discloses geographical location data is displayed at the camera but not recorded in the image. There does not appear to be any disclosure in Murphy for recording the image in a picture as described at page 9, lines 1-7. Murphy modified by Walker fails to disclose or suggest a terminal (PC) responsive to a user for selecting and displaying digital images with textual description and geographical coordinates.

h. Claim 12:

(i) "The device of Claim 1 further comprising means in the terminal for editing the image to include the related geographical location and descriptive text."

Murphy at Column 4, lines 26-37, describes authenticating an image by expressing each pixel in an electronic representation of the image in digital form and then altering the least significant bit of a chosen number of pixels to contain an authentication message. In contrast, Stern discloses establishing a connection between the camera and a PC or workstation having Internet connectivity. The PC accesses a server for textual description related to the coordinates; the textual description and geographical coordinates being included in a picture. (Page 8, line 16 continuing to Page 9, line 4) Murphy fails to disclose a camera linked

to a PC via a network using network protocols enabling the user to edit the picture to include geographical location and descriptive text.

i. Claim 13:

(i) "...In a system including an image collecting device coupled to a remote data processing system and a workstation via a network using network protocols a method for recording an image including a geographical location, and/or environmental conditions in the medium,"

Murphy at Column 6, lines 31 - 36, discloses image data processed within the camera or at a remote processing station, but fails to disclose coupling the camera to a remote processing station via a network using network protocols. Murphy at Column 8 lines 26-29, discloses a camera linked to a GPD receiver/processor by a cable link or a wireless link and displays geographical coordinates (item 430) as shown in Figure 2. However, there is no disclosure in Murphy that the displayed coordinates are recorded in the image 230 or 240 or the map 250 as shown in Figure 1. Murphy fails to disclose coupling the image-collecting device with the remote data processing system and workstation via a network using network protocols and recording the image, including the geographical location and environmental conditions in the medium.

(ii) "...storing and accessing descriptive text of a plurality of objects of interests related to the digital image at a geographical location in a remote processing system or workstation;"

Murphy at column 6, lines 31 –36 discloses image data processed within the camera or at a remote processing station, but fails to disclose storing and accessing related descriptive text to the image. Walker at col. 5, lines 46 through column 6, line 7 discloses

personal image segments and environment segments linked together in a tape by an assembly and processing module. Walker fails to disclose the camera accessing the stored text in the remote processing system. In Walker the remote processing system controls accessing the stored text segments for producing a personal collection of images. In contrast, Stern discloses the camera controls the accessing of the stored text in the remote processing system.

Murphy modified by Walker fails to disclose the camera controlling the accessing of stored text in a remote processing system, the camera being coupled to the remote processing system and workstation via a network using network protocols.

j. Claim 14:

Claim 14 further limits Claim 13 and is patentable on the same basis thereof.

k. Claims 15 and 25:

Claims 15 and 25 further limit Claim 1 and Claim 13 and are patentable on the same basis thereof.

l. Claim 16:

(i) "...selecting the stored descriptive text related to the object of interest at the geographical location to be recorded in a digital image."

Walker at Column 2, lines 6-69, and Column 5, lines 46 through Column 6, line 7, describes collecting images of a customer at different cameras located at different geographical positions based on a detector responsive to a tag or card carried by the customer. A master controller selects the images and text for producing a tape containing images and text. In contrast, Stern uses a single camera to record the images and the camera controls the selection of descriptive text for the images. Walker requires the customer to carry a tag or card to activate the camera. Stern does not require tag or card to record a customer image. Walker does not provide

the missing element in Murphy because the stored descriptive text related to the object of interest is not selected by the camera and is not provided unless the customer carries an identification tag. Moreover, the combination of Murphy and Walker would be inoperative because Walker requires the customer to register identification and information data prior to activating the camera. See Column 4, lines 10-15.

m. Claim 17:

Claim 17 further limits Claim 13 and is patentable on the same basis thereof.

n. Claims 18 & 26:

(i) "...accessing the remote processing system or workstation and correlating and recording the digital image with the geographical location, and descriptive text associated with the object of interest in a medium."

Murphy at column 6, lines 31-36 describes an image processing system in the camera or at a remote processing station for processing images. The image processing system displays text and geographical coordinates, but does not record the text and coordinates in the image. In contrast, Stern discloses the camera records the image with geographical/environmental information and descriptive text obtained from a remote PC, as described in the specification at page 8, line 16 continuing to page 9, line 7. Walker does not provide the missing element in Murphy because camera data is downloaded to a central storage system, which is not accessible by the camera. Murphy and Walker fail to disclose a camera accessing the remote processing station for correlating and recording the digital image with a geographical location and descriptive text.

o. Claims 19 & 27:

(i) "...collecting and storing environmental conditions related to the image for recording in the medium."

Murphy at Column 8, lines 26-29, discloses authentication of an image by comparing the position information with stored position information. The cited text lacks any disclosure related to collecting and storing environmental conditions related to the image.

p. Claim 20:

(i) " connecting and providing to a network using network protocols, the image, geographical location, and environmental conditions of the object of interest stored in the image-collecting device for processing and recording in a medium by the network."

Walker discloses a plurality of cameras connected to a central storage system for downloading images actuated by a customer carrying a tag. The images do not contain geographical location and environmental conditions. The customer inputs this information to the central processing system before the images are captured. Moreover, the downloading is transmitted via collection network which does not disclose or require the use of network protocols to communicate the images to the central storage system. Murphy as modified by Walker fails to disclose a camera connecting to a network using network protocols and providing images with geographical location and environmental conditions for processing and recording in a medium by the network..

q. Claim 23:

(i) "...editing the image to include the related geographical location and descriptive text."

Murphy at Column 4, lines 26-37, discloses editing the image for authentication purposes, and does not describe editing the image to include geographical location and descriptive text related to the image. Nor does Walker disclose the camera editing the image to include geographical location and descriptive text; as described in the specification at page 8, line 16 continuing to page 9, line 7.

Murphy modified by Walker fails to disclose the camera actively editing the image at a remote processing station.

r. Claim 24:

Claim 24 is the program product form of Claim 1 and is patentable on the same basis thereof.

REGARDING PARAGRAPH 4:

Claims 6-9 include elements not disclosed, suggested or taught by Murphy in view of Walker and Twining, as follows:

a. Claims 6 & 7:

(i)"...environmental sensing means for collecting and storing environmental conditions related to the image for recording in the medium."

Twining at column 2, lines 31 – 38 discloses a portable data gathering device for recording data and once recorded, may be exchanged with a network server through a connection with a personal computer or from its' remote data gathering location. Twining does not store descriptive text of an image. Nor does the server store descriptive text of an image. Thus, Twinning fails to supply the missing element in Murphy as modified by Walker. In any case, claims 6 & 7 further limit claim 1 and are patentable on the same basis.

b. Claim 8:

(i)"...wireless means for connecting and providing to the network the geographic location and conditions of the object of interest stored in the memory for processing and recording in a medium by the network."

Murphy at Column 19, lines 29-32, discloses a camera linked to a GPD receiver/processor by a cable link or wireless link. Murphy fails to disclose a wireless link connecting a camera to a network for processing, recording geographical location and conditions of an image stored in a camera for incorporation in a medium by the network. Nor do Walker and Twining disclose a wireless link providing a network with geographic location and conditions stored in a camera for processing by the network. The cited references fail to disclose the elements of claim 8 .

c. Claim 9:

(i)"...a terminal coupled to the network and responsive to a user to obtain, display and record the geographical location and descriptive text in the medium."

Murphy at Column 6, lines 31-36, discloses an image processing system in a camera for processing images within the camera or at a remote processing station. Murphy fails to disclose the terminal is responsive to user input to obtain, display and record geographical location and descriptive text in a medium. Nor do Walker and Twining disclose a user inputting geographical location and descriptive text of an image for recording in a medium. The cited references fail to disclose the elements of claim 9.

REGARDING PARAGRAPH 5:

Claims 21-22 and 28-29 include elements not disclosed in Murphy in view of Walker and Matsuzawa, as follows:

a. Claim 21:

(i) "storing thumbnail images related to objects of interest in the remote data processing system according to geographical location coordinates."

Matsuzawa at column 8, line 62 through column 9, line 13 stores thumbnail images in a database based on in and out time code values. There is no disclosure in Matsuzawa related to storing images in a database using geographical coordinates of the images. The in and out time code coordinates in a database are not equivalent to geographical location coordinates of an image. Moreover, there is no disclosure in Matsuzawa of storing thumbnail images in a remote data processing system. Murphy modified by Walker and Matsuzawa discloses storing thumbnail images in a database and retrieving them based on in and out time codes within the database. In contrast, Stern discloses storing and retrieving thumbnail images

in a remote data processing system according to geographical location coordinates of the images. Murphy modified by Walker and Matsuzawa fails to disclose the elements of claim 21.

b. Claim 22:

(i) "..transmitting geographical location coordinates of an object of interest to the remote data processing system; receiving a thumbnail image related to the geographical location coordinates from the remote data processing system; and recording the related thumbnail image in the medium."

Matsuzawa uses thumbnail images from within the data processing system, and does not transmit geographical locations of thumbnail images to a remote data processing system. Nor does Matsuzawa disclose transmitting the thumbnail image or putting the thumbnail image in a medium

c. Claim 28:

(i)"...program instruction in the medium for accessing thumbnail images of objects of interest in the remote data processing system according to geographical location coordinates."

Matsuzawa at Column 10, lines15 -21, discloses retrieving a thumbnail from a management table. A CPU obtains the object id, checks the id of the management table and obtains the location information; in and out time codes, and displays a thumbnail on the display device. The thumbnail is not displayed according to geographical location coordinates, but location coordinates in time codes within a database. Time codes as location coordinates in a database are not equivalent or suggest geographical coordinates of an image. Matsuzawa fails to supply the missing element in Murphy as modified by Walker relating to accessing thumbnail images according to geographical location coordinates.

REGARDING PARAGRAPH 6:

Claims 30-36 include elements not disclosed in Murphy in view of Walker and in further view of Godfrey, as follows:

a. Claim 30:

(i) "...means for accessing images stored in a network according to the geographical location coordinates;"

Murphy at Column 7, lines 49-57, discloses accessing images within the camera via a hyperlink digital image location data file. Murphy fails to disclose accessing images stored in a network according to geographical location coordinates.

(ii) "...means for providing the geographical location coordinates to the network and obtaining images from the network according to the geographical location coordinates;"

Walker stores images occurring at different geographical positions, and outputs to the customer a collection of images at the different geographical locations. Walker fails to disclose providing geographical coordinates to a network for obtaining images related to the geographical location coordinates.

(iii) "...means for incorporating an electronic message transmitted over the network at least one of the images obtained from the network."

Godfrey at Column 5, lines 45-57, and Column 20, lines 40-42, discloses a redirector application converting a meeting request into an email with an attachment containing the meeting details. The redirector sends an email with the attachment to a user for acceptance or declining the meeting request. The response is sent in an email to the sender of the meeting request. Godfrey fails to disclose an image obtained from the network and incorporated into in an electronic message sent over the network.

coordinates at the completion of the creation of the electronic message. Murphy and Walker as modified by Godfrey fail to disclose the elements of claim 32.

d. Claim 33:

(i) "..The system of Claim 30 wherein the geographical location coordinates are established at the start of the creation of the electronic message."

Murphy and Godfrey fail to disclose establishing the geographical location coordinates in the electronic message at the start of the creation of the electronic message for similar reasons indicated in distinguishing Claim 32 from Murphy and Godfrey.

E. Claim 34:

Claim 34 further limits Claim 30 and is patentable on the same basis thereof.

f. Claim 35:

(i) "...The system of Claim 30 wherein the terminal is linked to the network by a wired or wireless connection."

Murphy discloses a camera wirelessly linked to a single processor receiver (Figure 3). There is no disclosure in Murphy linking the camera to a network by wired or wireless connection. Godfrey discloses a terminal wirelessly connected to a network and as implemented in Murphy would be contrary to the connection between the camera and the playback unit for storing images in the playback unit by geographical coordinates. Murphy and Walker as modified by Godfrey fail to disclose the elements of claim 35.

Summarizing, Murphy, Walker and Godfrey all fail to disclose sending an email over a network with an image obtained from the network according to the geographical location coordinates of the image. Murphy and Walker do not disclose sending an email including an image over a network.. Godfrey discloses a push information system sending email messages containing meeting requests which are not images or pictures based on geographical coordinates. Godfrey does not supply the missing elements in Murphy and Walker.

b. Claim 31:

(i) "...The system of Claim 30 wherein the geographical location coordinates provided to the network are the geographical location coordinates of the terminal creating the message."

Murphy at Column 10, lines 37-40, discloses the location of icons on a map corresponding to geographical locations of images in a display. Murphy fails to disclose providing a network the geographical location coordinates of an image whereby the geographical location coordinates are those of the terminal creating an electronic message. Murphy and Walker as modified by Godfrey fail to disclose the elements of claim 31

c. Claim 32:

(i) ...The system of Claim 30 wherein the geographical location coordinates are established at the completion of the creation of the electronic message."

Murphy at Column 11, lines 66 to Column 12, line11, discloses downloading image data from a camera to a playback unit via download connections. The playback unit enables the user to view the selected images represented by icons. There is no disclosure in Murphy and Walker or Godfrey relating to providing the network with the geographical location

g. Claim 36:

Claim 36 is a method form of Claim 30 and is patentable over the cited references on the same basis as Claim 30.

REGARDING PARAGRAPH 7:

Claims 37-39 include elements not disclosed in Murphy in view of Walker and Godfrey, and in further view of Tobin, as follows:

a. Claim 37:

(i) "...The method of Claim 36 wherein the obtained images are provided as part of advertising."

Tobin at column 7, lines 55 – 67 discloses a web site page that displays images of gift suggestions not incorporated in an electronic message but in response to an electronic message. Tobin does not supply the missing element in Murphy, Walker and Godfrey because the obtained images are not related to geographical location coordinates.

b. Claim 38:

(i) "...offering the images to users in a prioritized manner based on the amount of payment associated with each image."

Tobin at column 7, lines 47-54, discloses displaying various web site pages providing information on purchasing options through hyperlinks. Tobin does not suggest supplying images to users in a prioritized manner based on the amount of payment associated with each image. Tobin fails to supply the missing element in Murphy and Walker in view of Godfrey related to supplying images related to geographical coordinates. .

c. Claim 39:

(i) "...providing the sender of an electronic message an incentive to include an advertising image in the message."

Claim 39 depends upon Claim 36, which relates to electronic messages incorporating images from a network based on geographical location coordinates. Tobin relates to web pages offering product options for purchase. Tobin fails to disclose the web site pages are generated according to geographical location coordinates for incorporation in an electronic message. Tobin does not supply the missing element in Murphy and Walker in view of Godfrey

Summarizing, Murphy, Walker, twining, Matsuzawa and Tobin, alone or in combination fail to disclose, suggest or teach the elements of claims 1 – 39 for the reasons previously enumerated in discussing each of the claims with respect to the cited reference(s). Without such disclosure, suggestion or teaching the references, there is no basis for a worker skilled in the art to implement claims 1 – 39. The rejection of claims 1 – 39 under 35 USC 103 (a) fails for lack of support in the references , taken alone or in combination. Withdrawal of the rejection and allowance of claims 1 – 39 are requested.

CONCLUSION:

Having amended the claims to clarify and distinguish them with respect to the prior art, applicant requests entry of the amendment, allowance of the claims, and passage to issue of the case.

AUTHORIZATION:

The Commissioner is hereby authorized to charge any additional fees which may be required for the timely consideration of this amendment under 37 C.F.R. §§ 1.16 and 1.17, or credit any overpayment to Deposit Account No. 50-0510, Order No. YOR9-2000-0301 (1963-7393).

Respectfully submitted,
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